

Presentment Date and Time: March 28, 2011 at 12:00 noon (Prevailing Eastern Time)

Objection Deadline: March 28, 2011 at 11:30 a.m. (Prevailing Eastern Time)

JONES DAY
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Jayant W. Tambe
Aviva Warter Sisitsky
Benjamin Rosenblum

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re:	:
	:
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:
	:
Debtors.	:
	:
	:
-----X	
	:
LEHMAN BROTHERS HOLDINGS INC. and	:
LEHMAN BROTHERS SPECIAL	:
FINANCING, INC. and OFFICIAL COMMITTEE	:
OF UNSECURED CREDITORS OF LEHMAN	:
BROTHERS HOLDINGS INC., <i>et al.</i>	:
Plaintiffs and	:
Intervenor,	:
	:
-against-	:
	:
NOMURA INTERNATIONAL PLC,	:
	:
Defendant.	:
-----X	
	:
LEHMAN BROTHERS HOLDINGS INC. and	:
LEHMAN BROTHERS SPECIAL	:
FINANCING, INC. and OFFICIAL COMMITTEE	:
OF UNSECURED CREDITORS OF LEHMAN	:
BROTHERS HOLDINGS INC., <i>et al.</i>	:
	:
Plaintiffs and	:
Intervenor,	:
	:
-against-	:

NOMURA SECURITIES CO., LTD. :
 :
Defendant. :
-----x

NOTICE OF PRESENTMENT OF STIPULATED SCHEDULING ORDER

PLEASE TAKE NOTICE that the undersigned will present the annexed proposed Stipulated Scheduling Order for Consolidated Actions (the “Stipulated Scheduling Order”) to the Honorable James M. Peck, United States Bankruptcy Judge, for signature on **March 28, 2011 at 12:00 noon (Prevailing Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed Stipulated Scheduling Order, with proof of service, is served and filed with the Clerk of the Court and a courtesy copy is delivered to (i) the Bankruptcy Judge’s chambers and (ii) the undersigned, so as to be received by **March 28, 2011 at 11:30 a.m. (Prevailing Eastern Time)**, the Stipulated Scheduling Order may be signed.

Dated: March 22, 2011
New York, New York

Respectfully submitted,

/s/ Benjamin Rosenblum
Jayant W. Tambe
Aviva Warter Sisitsky
Benjamin Rosenblum
JONES DAY
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New York, New York 10017
Telephone: (212) 326-3939
Facsimile: (212) 755-7306

**UNITED STATES BANKRUPTCY COURT
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LEHMAN BROTHERS SPECIAL	:
FINANCING, INC. and OFFICIAL COMMITTEE	:
OF UNSECURED CREDITORS OF LEHMAN	:
BROTHERS HOLDINGS INC., <i>et al.</i>	:
Plaintiffs and	:
Intervenor,	:
	:
-against-	:
	:
NOMURA INTERNATIONAL PLC,	:
	:
Defendant.	:
-----X	
	:
LEHMAN BROTHERS HOLDINGS INC. and	:
LEHMAN BROTHERS SPECIAL	:
FINANCING, INC. and OFFICIAL COMMITTEE	:
OF UNSECURED CREDITORS OF LEHMAN	:
BROTHERS HOLDINGS INC., <i>et al.</i>	:
	:
Plaintiffs and	:
Intervenor,	:
	:
-against-	:
	:
NOMURA SECURITIES CO., LTD.	:
	:
Defendant.	:
-----X	

STIPULATED SCHEDULING ORDER FOR CONSOLIDATED ACTIONS

This Civil Case Management Plan submitted in accordance with Fed. R. Bankr. P. 7026 and Fed. R. Civ. P. 26(f), is adopted as the Scheduling Order of this Court for these consolidated actions. It supersedes the So Ordered Stipulated Scheduling Order between Debtors and Nomura International plc, Nomura Securities Co., Ltd. and Nomura Global Financial Products, Inc. [Docket No. 12270].

1. Amended pleadings may not be filed except with leave of the Court.
2. All fact discovery shall be completed by November 21, 2011 (except that Responses to any Request for Admission or Local Rule 7011-1(c) Interrogatories served on November 21, 2011 shall be due no later than December 19, 2011).
3. The parties are to conduct discovery in accordance with the Federal Rules of Bankruptcy Procedure, the Federal Rules of Civil Procedure (as incorporated therein), and the Local Rules of this Court. In accordance with Federal Rules of Bankruptcy Procedure 9014 and 7026-7037, Federal Rules of Civil Procedure 26-37 shall apply in their entirety to these proceedings. The following interim deadlines may be extended by the written consent of the parties without application to the Court, provided all fact discovery is completed by the date set forth in paragraph 2 above:

- A. Requests for production of documents may be served no later than May 16, 2011.
- B. Objections to requests for the production of documents to be served within 20 days of the service of each request or set of requests for the production of documents.
- C. Interrogatories pursuant to Local Bankruptcy Rule 7033-1(a) and 7033-1(b) may be served no later than May 16, 2011.

D. Interrogatories pursuant to Local Bankruptcy Rule 7033-1(c) may be served no earlier than July 14, 2011 and no later than November 21, 2011.

E. Requests for admissions may be served no earlier than July 14, 2011 and no later than November 21, 2011.

F. Document production to be substantially completed by June 30, 2011.

G. Depositions of fact witnesses to be completed by November 21, 2011.

4. Expert reports will be exchanged on February 6, 2012. The parties will exchange any rebuttal expert reports on March 6, 2012. Expert discovery to be completed 21 days after the receipt of the last expert report.

5. Dispositive motions to be filed no later than April 20, 2012.

6. A pretrial hearing shall be held at a date to be determined.

7. The trial(s) shall be held at a date to be determined by the Court.

Dated: March 9, 2011
New York, New York

/s/Sarah E. Lieber

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Sarah E. Lieber
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*Attorneys for the Debtors and
Debtors in Possession*

Dated: March 9, 2011
New York, New York

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*Attorneys for Nomura International plc,
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Global Financial Products, Inc.*

Dated: March 9, 2011
New York, New York

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*Attorneys for the Official Committee of
Unsecured Creditors*

SO ORDERED
Dated: March ___, 2011
New York, New York

U.S. BANKRUPTCY JUDGE